ISOSURE S.A.C.

Calle Dean Valdivia #148 Edificio Platinum Torre I Piso 11 Oficina 1126 San Isidro - Lima - Perú | Central Telefónica: +51 01 711 8249









INTERNATIONAL CYANIDE MANAGEMENT CODE

| ORICA | | | |
|-------|----------------------------|--------|-------------|
| | SUMMARY AUDIT REPORT | CODIGO | 20131016639 |
| | LATIN AMERICA SUPPLY CHAIN | | 01. 1 |
| | | FECHA | 05/05/2017 |

In collaboration with:









INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Transportation Operations Summary Audit Report



For The International Cyanide Management Code and ORICA — LATIN AMERICA

Verification Protocol

www.cyanidecode.org
May 2017







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INTRODUCTION

Information on the audited operation

Name of Cyanide Transportation Facility: ORICA MINING SERVICES PERU S.A. (ORICA)

Name of Facility Owner: ORICA MINING SERVICES PERU S.A. (ORICA) Name of Facility Operator: ORICA MINING SERVICES PERU S.A. (ORICA)

Name of Responsible Manager: Luis Villegas Address: Av. Dionisio Derteano 144, piso 20 State/Province/Country: San Isidro/Lima/ Peru

Telephone: +511 2176000 Fax: --E-mail: <u>luis.villegas@orica.com</u>

Name of Cyanide Transportation Facility: ORICA ARGENTINA S.A.I.C. (ORICA)

Name of Facility Owner: ORICA ARGENTINA S.A.I.C. (ORICA) Name of Facility Operator: ORICA ARGENTINA S.A.I.C. (ORICA)

Name of Responsible Manager: Lucas Klein

Address: Av. Lib. Gral José de San Martín 521 (O)1er Piso, Ciudad Capital

State/Province/Country: San Juan/ Argentina

Telephone: +54 264 430 3200 Fax: -- E-mail: lucas.klein@orica.com

Aspects of the location and description of the operation:

Orica Audtralia Pty Ltd

Orica is an Australian-owned, publicity listed company with global operation. Orica is managed as discrete business units that produce a wide variety of products and services. The Mining Chemicals unit is based in Australia and exports products to Asia, Africa and the Americas, as well as supplying the local Australian industry. This unit's main product is sodium cyanide (cyanide), which is manufactured at Orica's Yarwun cyanide production facility (Yarwun Facility) in QLD, Australia.

Yarwun Production Facility

Orica's Yarwun Facility, wich is located at Yarwun approximately eight kilometres (km) by road from Gladstone, QLD, commenced operations in 1989 and is engaged in the manufacture of cyanide (both solid and liquid forms), etc.

Solid cyanide is packaged in either sparge isocontainers, wich have a maximum gross weight of 26 tonnes, or intermediate bulk containers (IBCs), which are in turn packed into a container. A maximum of 20 IBCs can be packed into a freight container with a maximum gross weight of 28 tonnes. Liquid cyanide is packaged into isocontainers with a maximum gross weight of 26 tonnes.

Global Supply Chain

Orica is the largest supplier of sodium cyanide for gold mining.

Orica is a truly global company: it has a very diverse workforce of more than 14,500 people. Currently, our international supply chain is connected to customers in more than 130 countries, and is supplied from a number of strategically located manufacturing facilities. Thanks to its network of companies and external suppliers which are evaluated annually under its standards of environment, security, and quality in the service.

Ventanilla Box to Sparge Transfer Facility, Callao, Peru



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Lead Auditor Signature

ORICA MINING SERVICES PERU S.A. (ORICA) 's Transfer Facility in Lima, Peru was constructed to supply mine site customers in Peru with cyanide transported within sparge isotanks. The Transfer Facility is comprised of a purpose-built structure that house material handling equipment and associated facilities (these include a partly opern warehouse protecting sea containers containing boxes cyanide; change rooms; equipment storage; office, ablutions, guardhouse; and yard área) located within the Neptunia S.A. empty container warehouse at Callao.

The Transfer Facility was constructed of 2007 and commissioned with the first isotank batch transfer complete don 6 June 2007.

The storage and transfer facility has not been modified since that initial certification audit. The initial certification report documented that quality control and quality assurance programs were implemented for storage and transfer facilit.

Peru Supply Chain

ORICA MINING SERVICES PERU S.A. (ORICA) has traded sodium cyanide over 30 years. In the Peru, the solid sodium cyanide briquettes are imported from different factories around the world. In Peru, The container arriving at the port of Callao they are transported by the company APM (certified company) to Ventanilla Box to Sparge Transfer Facility, before being transported to mining customer by certified carriers. This certification audit included the components in the Peru Supply Chain.

The scope of this audit includes the operation of ground transportation from Warehouse of Cyanide in Callao, where cyanide is released, to delivery at the customer's installation Cyanide is received from the manufacturer or consigner in either of the following packaging presentation:

- Interior Poly-propylene super-sack filled up to 1 ton and placed inside a Polyethylene bag and wooden box.
- ISOtanks to 20 ton

No less than 20 ton are placed in standard 20-feet or 40-feet shipping containers or ISOtanks; boxes is placed way to prevent lateral movement within the container. In addition to normal anchoring the container to the chassis of trucks, containers are secured with chains, for double safety tie. The containers are received locked and tagged.

These activities are carried out 3 years ago with ZERO (0) accidents.

Argentina Supply Chain

ORICA ARGENTINA S.A.I.C. (ORICA) has traded sodium cyanide over 07 years. In the Argentina, the solid sodium cyanide briquettes are imported from different factories around the world. The container arriving at the port of Punta Arenas of Chile or port of Deseado and Buenos Aires of Argentina they are transported by the company CRUZ DEL SUR (certified company by ICMI) to mining customer. This certification audit included the components in the Argentina Supply Chain.

These activities are carried out 3 years ago with ZERO (0) accidents.



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Lead Auditor Signature

SUMMARY AUDIT REPORT

FOR CYANIDE TRANSPORTATION OPERATIONS

Instructions

- 1. The basis for the finding and/or statement of deficiencies for each Transport Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.
- 2. The name of the cyanide transportation operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report.
- 3. An operation undergoing a Code Verification Audit that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.
- 4. The Summary Audit Report and Corrective Action Plan, if appropriate, for a cyanide transportation operation undergoing a Code Verification Audit with all required signatures must be submitted in hard copy to:

International Cyanide Management Institute (ICMI)

1400 I Street, NW, Suite 550

Washington, DC 20005, USA

- 5. The submittal must be accompanied by 1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report and Corrective Action Plan, if necessary, on the Code Website, and 2) a completed Auditor Credentials Form. The lead auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent.
- Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable cyanide transportation company.
- 7. The description of the cyanide transport company should include sufficient information to describe the scope and complexity of its operation.

CNInc.

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NOTARIA BECERRA SOSAYA

Av. Aviacion N° 2489 - San Borja Central T. 200-2770

Horano de Atencion: L.-V. 08:00 a.m. a 07:00 p.m. Sabado 08:00 a.m. a 01:00 p.m.

Trámite Vehicular: Sábados hasta las 6:00 p.m.

www.notariabecerrasosaya.com

Auditor's Finding

This Operation is:

X in full compliance

in substantial compliance

not in compliance

The International Cyanide Management Code

with the International Cyanide Management Code.

No significant cyanide incidents or exposures and releases were note as occurring during the audit period.

Audit Company: ISOSURE SAC | CIANURO INCOR PORATED EIRL

Audit Team Leader: Luis Torres Argandoña

E-mail: auditoria@iso-sure.com

Date(s) of Audit: 01 and 02 March 2017

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the verification audit.

I further attest that the verification audit was conduct in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

Name and Signatures of Other Auditors

| Name | Position | Signature | Date | |
|--------------------------|--|-------------------|---------------------|--|
| Luis Torres Argandoña | Lead Auditor and Transportation, Production and Mining Technical | cistories procude | रका 31 October 2017 | |
| Carlo Vargas | Transportation and Mining Technical | | 31 October 2017 | |



LEGALIZACIÓN ALA DORS GRICA

Verification Protocol

TRANSPORT

Transport cyanide in a manner that minimizes the potential for accidents and releases.

1.1 TRANSPORT PRACTICE 1.1

SELECT CYANIDE TRANSPORT ROUTES TO MINIMIZE THE POTENTIAL FOR ACCIDENTS AND RELEASES.

| | X in full compliance with |
|------------------|--|
| The operation is | ☐ in substantial compliance withTransport Practice 1.1 |
| | □ not in compliance with |

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.1 requiring an operation Select cyanide transport routes to minimize the potential for accidents and releases.

Peru Supply Chain

The ORICA operation for the transport and warehouse of sodium cyanide was subject to an audit. The Auditor was verifies and all questions related to the transport protocol ICMI were answered. ORICA has the procedure for the Transport of Sodium Cyanide include in the contract with the transportation company, whose goal is to transport sodium cyanide, without causing damage or injury to persons and / or the environment and the preservation of substances transported from port of Callao to VENTANILLA BOX TO SPARGE TRANSFER FACILITY (Distribution Warehouse ORICA contracted) to the point set by the client (Company certified by the Code).

All activities associated with Transport Practice 1.1 are performer by

| Transportation or Warehouse Company | Date of Certification | Operation | Link |
|---|-----------------------|--|---|
| APM TERMINALS | March 2015 | Transportation | http://cyanidecode.org/signatory- company-categories/apm- terminals-inland-services-sa- peru |
| TRANSATILSA | July 2016 | Transportation | http://cyanidecode.org/signatory- company/transaltisa-s-a |
| DCR | June 2017 | Transportation | http://cyanidecode.org/signatory- company/dcr-mineria-y- construccion |
| EDEWIT | July 2017 | Transportation | http://cyanidecode.org/signatory- company-categories/edewit-sr- ltda-peru |
| ORICA | April 2015 | Ventanilla box to sparge transfer facility Warehouse | http://cyanidecode.org/signatory- company/orica-australia |



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Lead Auditor Signature

The route is evaluated:

| Transportation or Warehouse Risk evaluation Company | | Operation | Link |
|---|--|---|---|
| APM TERMINALS | Callao Port – Warehouse Lima – Antamina | Transportation | http://cyanidecode.org/signatory- company-categories/apm- terminals-inland-services-sa- peru |
| TRANSATILSA | FRANSATILSA • Lima – Yanacocha Transportation | | http://cyanidecode.org/signatory- company/transaltisa-s-a |
| DCR | Lima – Inmaculada Lima – Ares Lima – Lagunas Norte Lima – Pierina Lima – Yanacocha | Transportation | http://cyanidecode.org/signatory- company/dcr-mineria-y- construccion |
| EDEWIT | Lima – Pucamarca | Transportation | http://cyanidecode.org/signatory- company-categories/edewit-sr- ltda-peru |
| ORICA | Sparge Plant | Ventanilla box to sparge transfer facility Warehouse | http://cyanidecode.org/signatory- company/orica-australia |

The evidenced records are as follows

- Roadmap
- Risks of Cyanide Transportation/ Warehouse

The evaluated routes have been approved by the Ministry of Transport of Peru. The service has been approved by the National Superintendency of Taxation of Peru.

Additionally, in Item 16.1, of the contract with transportation providers, it establishes:

- 1. Periodical realization (monthly, evidence of visits and annual audit) of precincts, vehicles (inspected by ORICA before each trip) and operation (on a continuous basis since a representative of ORICA accompanies the convoy on each trip.
- 2. Suspension for safety in case of non-compliance with safety regulations.

Item 16.12 ORICA states, "The contractor shall ensure that route risk assessments (RRAs) are carried out well in advance to initiate the service of new routes in such a way that drivers can be adequately trained on all risks and critical aspects Of the route covered, this assessment must be available to ORICA so that it can be assured that the drivers are well trained and aware of the risks that could be encountered in the route, and ORICA must participate in this route evaluation".

Argentina Supply Chain

The ORICA operation for the transport of sodium cyanide was subject to an audit. The Auditor was verifies and all questions related to the transport protocol ICMI were answered. ORICA has the procedure for the Transport of Sodium Cyanide include in the contract with the transportation company, whose goal is to transport sodium cyanide, without causing damage or injury to persons and / or the



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^

environment and the preservation of substances transported from port of Punta Arenas of Chile or port of Deseado and Buenos Aires of Argentina to the point set by the client.

The route is evaluated:

Cerro Negro

- Port of Punta Arenas Chile a Unidad Minera Cerro Negro (Gold Corp) Argentina
- Port of Deseado and Buenos Aires Argentina a Unidad Minera Cerro Negro (Gold Corp) Argentina

Veladero

Zona Portuaria | Buenos Aires – Unidad Minera Veladero (Barrick)

Don Nicolás

• Port Arenas - Chile a Unidad Minera Don Nicolas (MIRGOR)

The evidenced records are as follows

- Roadmap
- Risks of Cyanide Transportation

Additionally, in the contract with transportation providers, it establishes:

- Periodical realization (monthly, evidence of visits and annual audit) of precincts, vehicles (inspected by ORICA before each trip) and operation (on a continuous basis since a representative of ORICA accompanies the convoy on each trip.
- Suspension for safety in case of non-compliance with safety regulations.

ORICA states, "The contractor shall ensure that route risk assessments (RRAs) are carried out well in advance to initiate the service of new routes in such a way that drivers can be adequately trained on all risks and critical aspects Of the route covered, this assessment must be available to ORICA so that it can be assured that the drivers are well trained and aware of the risks that could be encountered in the route, and ORICA must participate in this route evaluation".

Peru Supply Chain

In the "contract with transportation company", stablished procedure to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks, this activity is resposability of the Supervisor of ORICA.

ORICA implemented the Roadmaps, in the route evaluation report the major risks were identified as the urban areas, population density, road infrastructure, animal crossing, proximity to water bodies, presence of fog, likelihood of free fall.

Risks associated to those characteristics include: vehicle crash, vehicle rollover, vehicle skid, load, loss, pedestrian accidents, product spill in water body, and water contamination, among others.

For each specific route, a risk assessment with a photographic log was developed in 2016. Risk management measures are listed for each portion of the routes based on the characteristics and risk level.

In addition, ORICA establishes the procedure SUPCH-PTR-001 Dispatch and transport of Products v9, 2.11.2016, which is included in the contract with the service providers in which the routes for the route evaluation and the realization of the Transport process.



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During the audit, the SUPCH-RTR-005 Convoy Supervisor Trip Report was evidenced, which shows the findings during the route evaluation, which is accompanied by a safety report and evaluation of the same route for the implementation of the necessary controls safety on the route.

Argetina Supply Chain

In the "contract with transportation company", stablished procedure to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks, this activity is resposability of the Supervisor of ORICA.

ORICA implemented the Roadmaps, in the route evaluation report the major risks were identified as the urban areas, population density, road infrastructure, animal crossing, proximity to water bodies, presence of fog, likelihood of free fall.

Risks associated to those characteristics include: vehicle crash, vehicle rollover, vehicle skid, load, loss, pedestrian accidents, product spill in water body, and water contamination, among others.

For each specific route, a risk assessment with a photographic log was developed in 2016. Risk management measures are listed for each portion of the routes based on the characteristics and risk level.

In addition, ORICA establishes the procedure PR-SC-004 Dispatch and Transportation of Products, which is included in the contract with the service providers in which the routes for the route evaluation and the realization of the Transport process.

During the audit, the Convoy Supervisor Trip Report was evidenced, which shows the findings during the route evaluation, which is accompanied by a safety report and evaluation of the same route for the implementation of the necessary controls safety on the route.

Peru Supply Chain

According to "SUPCH-PTR-001 Dispatch and transport of Products v9, 2.11.2016", routes are verified entirely once a year or to the first transport to a client by ORICA's Control and Analysis team. In addition, for all cyanide transportation operations, the supervisor of ORICA must present a travel log "SUPCH-RTR-005 Convoy Supervisor Trip Report", in which the supervisor of ORICA has to note if there were any changes on the route. If any changes are identified, these are reviewed and assessed; and if applicable, the route risk assessment is updated. Temporary changes, such as route diversions, are verbally informed to the driver prior to the departure of the convoy.

ORICA identified the fire stations, police stations, technical support and hospitals and medical centers in the area, as well as phones and contacts.

Argentina Supply Chain

According to "PR-SC-004 Dispatch and Transportation of Products", routes are verified entirely once a year or to the first transport to a client by ORICA's Control and Analysis team. In addition, for all cyanide transportation operations, the supervisor of ORICA must present a travel log "Convoy Supervisor Trip Report", in which the supervisor of ORICA has to note if there were any changes on the route. If any changes are identified, these are reviewed and assessed; and if applicable, the route risk assessment is updated. Temporary changes, such as route diversions, are verbally informed to the driver prior to the departure of the convoy.

ORICA identified the fire stations, police stations, technical support and hospitals and medical centers in the area, as well as phones and contacts.



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As previously noted, the risk assessment of each routes describes the risks identified along them and the specific measures to be taken to address the risks. ORICA identified the main bridges, tolls, fuel stops and technical stop points.

The existence of letters sent to the fire companies and medical centers to communicate their roles in case of any emergency and open communication channels between ORICA and emergency support centers were check. Each of the support centers that are consider in the Emergency Plan ORICA sealed these.

Among the letters were consider emergency support centers (fire companies and medical centers) near ORICA and routes used by carriers hired by ORICA.

ORICA includes comments from interested parties (communities, other stakeholders, government agencies) in compliance with the procedure "SUPCH-PTR-001 Dispatch and transport of Products v9, 2.11.2016". These comments if applicable according to its usefulness in the selection of routes and risk management.

The centers are included in the Emergency Response Plan of ORICA.

Peru Supply Chain

For the transport of sodium cyanide ORICA asks its carriers have a control room also carriers with GPS system continually provide the positioning of each of the vehicles at all times. As well as continuous speed supervision at each point of the route from the starting point to the end then this information delivered to the Safety Officer ORICA.

ORICA also establishes specifications using trucks escort during the transit of sodium cyanide being due to use ONE (01) escort van for every three (03) or fewer units of traffic load.

The transportation company can upload ONE (01) Container for each platform and can only drag a wagon chassis. The convoy may include one or more escort vehicles at your request. Convoy displacement is dependent on weather conditions; Supervisor of ORICA evaluate the safety of the route in each case, may stop the convoy if satisfied that the conditions do not allow safe travel.

After each trip, the supervisor of ORICA must serve the "SUPCH-RTR-005 Convoy Supervisor Trip Report" where findings that compromise safety during transport they are included within the assessment route for modification evidences.

The transportation companies have a control room at:

| Transportation or Warehouse Company | Ubication | Operation | Link |
|---|---------------------|----------------|---|
| APM TERMINALS | Callao | Transportation | http://cyanidecode.org/signatory- company-categories/apm- terminals-inland-services-sa- peru |
| TRANSALTISA | Callao Arequipa | Transportation | http://cyanidecode.org/signatory- company/transaltisa-s-a |
| DCR | Arequipa | Transportation | http://cyanidecode.org/signatory- company/dcr-mineria-y- construccion |



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| EDEWIT | • Lima | Transportation | http://cyanidecode.org/signatory- company-categories/edewit-sr- ltda-peru |
|--------|--------|----------------|---|
|--------|--------|----------------|---|

During the audit process, the above-mentioned transport companies were visited to verify the good functioning of their GPS systems, as well as to verify, the actions to be taken in case of signal loss.

Argentina Supply Chain

For the transport of sodium cyanide ORICA asks its carriers have a control room also carriers with GPS system continually provide the positioning of each of the vehicles at all times. As well as continuous speed supervision at each point of the route from the starting point to the end then this information delivered to the Safety Officer ORICA.

ORICA also establishes specifications using trucks escort during the transit of sodium cyanide being due to use ONE (01) escort van for every six (06) or fewer units of traffic load.

The transportation company can upload ONE (01) Container for each platform and can only drag a wagon chassis. The convoy may include one or more escort vehicles at your request. Convoy displacement is dependent on weather conditions; Supervisor of ORICA evaluate the safety of the route in each case, may stop the convoy if satisfied that the conditions do not allow safe travel.

After each trip, the supervisor of ORICA must serve the "PR-SC-004 Dispatch and Transportation of Products" where findings that compromise safety during transport they are included within the assessment route for modification evidences.

During the audit process, the above-mentioned transport companies were visited to verify the good functioning of their GPS systems, as well as to verify, the actions to be taken in case of signal loss.

ORICA has provided information (MSDS, emergency and product information, Emergency Response Plan) to support emergency centers (health centers, police and fire companies) along the routes mentioned, and a signed and received letter with such information. This activity is carried out so that external support centers could be prepared for emergencies. In addition, comments are asked to external support centers to manage risk as a way to query and obtain feedback. ORICA has contacts with hospitals, police, Fire Company, Crane Service.

ORICA subcontract the cyanide transport operations.

| Transportation or Warehouse Company | Date of Certification | Operation | Operation | Link |
|---|--------------------------|----------------|-----------|---|
| APM TERMINALS | March 2015 | Transportation | Peru | http://cyanidecode.org/signatory- company-categories/apm-terminals- inland-services-sa-peru |
| TRANSALTISA | July 2016 | Transportation | Peru | http://cyanidecode.org/signatory- company/transaltisa-s-a |
| DCR | June 2017 | Transportation | Peru | http://cyanidecode.org/signatory-company/dcr-mineria-y-construccion |
| EDEWIT | July 2017 | Transportation | Peru | http://cyanidecode.org/signatory- company-categories/edewit-sr-ltda- peru |



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| ORICA | April 2015 | Ventanilla box to sparge transfer facility Warehouse | Peru | http://cyanidecode.org/signatory- company/orica-australia |
|--------------|------------|---|-----------|--|
| CRUZ DEL SUR | February | Transportation | Argentina | https://www.cyanidecode.org/signatory- company/v%C3%ADctor-masson- transportes-cruz-del-sur-sa |

During the audit process, the transportation companies were visited to verify compliance with the standards of the "Code"

For the third companies contracting ORICA establishes the following guidelines:

- The service must be complied with under the International Code for the Management of Sodium Cyanide and ICMI Protocol for the Transport of Sodium Cyanide.
- Comply with ORICA's reasonable directions and directions, as well as standard client procedures.
- All standards and procedures of ORICA.
- National laws

In addition, they must be audited by ORICA under its WCCP program, which includes the following evaluation chapters:

- Security Management System
- Contracts
- Risk Management and Security Base
- Compliance with regulations and regulations
- Transport vehicle
- Equipment
- Maintenance
- Storage
- Offices and Ports
- Emergency Management
- Physical Security (Facilities and equipment)
- Training and Competition
- Accident Investigation Distribution
- Polvorines
- Management of Containers.

1.2 TRANSPORT PRACTICE 1.2

ENSURE THAT PERSONNEL OPERATING CYANIDE HANDLING AND TRANSPORT EQUIPMENT CAN PERFORM THEIR JOBS WITH MINIMUM RISK TO COMMUNITIES AND THE ENVIRONMENT.

| The operation is | ☐ in substantial compliance withTransport Practice 1.2 |
|------------------|--|
| | □ not in compliance with |

X in full compliance with



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Lead Auditor Signature

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.2 requiring an operation Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment

Peru Supply Chain

The ORICA procedure (SUPCH-PTR-001 Dispatch and transport of Products v9, 2.11.2016 and Contrant of transportation company) establishes minimum requirements for drivers "Job profile": health, defensive driving training, and response training on sodium cyanide emergencies (spills and poisoning prevention).

Drivers are legally required to hold an A3C and A4 license. In order to obtain this license, have completed high school, undergo a psychological evaluation and a psycho-technical assessment, and hold a certificate from Professional Driver School.

The auditor reviews the documentation of:

| Transportation or Warehouse Company | Date of Certification | Position | Link |
|---|---|------------|---|
| APM TERMINALS | William Arroyo Agripino Aguilar Francisco Cusqisiban Jhonny Robles Cirilo Casimiro | Driver | http://cyanidecode.org/signatory- company-categories/apm- terminals-inland-services-sa- peru |
| TRANSALTISA | Jean Pierre Roca Constantini Casimiro Reynaldo Perca Tuya Luis Eduardo Vite Casaverde Johny Pinedo Conche | | http://cyanidecode.org/signatory- company/transaltisa-s-a |
| DCR | Percy Fernandez Melgar Jose Torres Flores Helmer Quispe Zuñiga Luis Davalos Suni Carlos Francisco Saavedra Camasita | Driver | http://cyanidecode.org/signatory- company/dcr-mineria-y- construccion |
| Marco Vasquez | | Supervisor | http://cyanidecode.org/signatory- company-categories/edewit-sr- Itda-peru |
| ORICA | | Supervisor | |



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| Frank Williams Arrollo Huaylla Ana Maria ramirez Blanco | |
|--|--|
|--|--|

During the audit, it was evident records:

- AIII-C License
- AIV License
- Appropriate occupational examination
- MTC driver record

As a result of the audit it was proven that ORICA only uses trained, qualified and licensed operators to operate their vehicles.

Records were verified and all staff operating the transport equipment was set to perform their work in a manner that minimizes the possibility of cyanide releases and exposures, these trainings include safe handling of cyanide both as emergency and poisoning, firefighting, first aid, defensive driving.

ORICA, has been working on a Program Management System Safety and Health at Work and Trainning Program. This program has been implemented as evidenced during the audit.

This program provides training related to leadership activities and management commitment, and Training, Hazard Analysis Working Procedures, Use of Personal Protective Equipment, Incident Investigation, Safety Inspections, Emergency Response, Drills, Environment Protection, Security, and Health Program.

Argentina Supply Chain

The ORICA procedure (PR-SC-004 Dispatch and Transportation of Products and Contrant of transportation company) establishes minimum requirements for drivers "Job profile": health, defensive driving training, and response training on sodium cyanide emergencies (spills and poisoning prevention).

Drivers are legally obliged to have a license granted by the CNRT (National Commission for Transport Regulation). In order to obtain this license, have completed high school, undergo a psychological evaluation and a psycho-technical assessment, and hold a certificate from Professional Driver School.

The auditor reviews the documentation of:

| Transportation Company | Date of Certification | Position |
|---------------------------|--|----------|
| CRUZ DEL SUR | Marcelo Fernandez Licencia 24244286 Venc 28/09/2018 Fernando Amaya Licencia 29345549 Venc: 04/07/2018 Javier Cuello Licencia 30400859 Venc 24/12/2018 Felipe Pereyra Licencia 26717725 Venc 18/07/2018 Miguel Vargas Licencia 30152548 Venc 01/03/2019 | Driver |

During the audit, it was evident records:

License



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• Appropriate occupational examination

As a result of the audit it was proven that ORICA only uses trained, qualified and licensed operators to operate their vehicles.

Records were verified and all staff operating the transport equipment was set to perform their work in a manner that minimizes the possibility of cyanide releases and exposures, these trainings include safe handling of cyanide both as emergency and poisoning, firefighting, first aid, defensive driving.

ORICA, has been working on a Program Management System Safety and Health at Work and Trainning Program. This program has been implemented as evidenced during the audit

This program provides training related to leadership activities and management commitment, and Training, Hazard Analysis Working Procedures, Use of Personal Protective Equipment, Incident Investigation, Safety Inspections, Emergency Response, Drills, Environment Protection, Security, and Health Program.

ORICA selects the most specialized drivers to transport sodium cyanide.

ORICA includes a training program that must be complemented by all drivers, supervisor and operatador of the warehouse, consisting of the following:

- Introduction to the Company
- Basic Ricks Prevention and Use of Personal Protection Equipment (PPE)
- Hazardous Materials Handling and Transportation Nivel 1, 2 and 3
- Emergency Response
- Defensive Driving

In addition, the following training courses are specific to drivers transporting cyanide shipments:

- Cyanide First Emergency Response
- General Information of Cyanide Product

According to Plan cyanide related training is refreshed once a year. During the audit, files of three drivers were reviewed, and all relevant training certificates were available.

ORICA subcontract the cyanide transport operations.

| Transportation or Warehouse Company | Date of Certification | Operation | State | Link |
|---|--------------------------|---|-------|---|
| APM TERMINALS | March 2015 | Transportation | Peru | http://cyanidecode.org/signatory- company-categories/apm-terminals- inland-services-sa-peru |
| TRANSALTISA | July 2016 | Transportation | Peru | http://cyanidecode.org/signatory- company/transaltisa-s-a |
| DCR | June 2017 | Transportation | Peru | http://cyanidecode.org/signatory- company/dcr-mineria-y-construccion |
| EDEWIT | July 2017 | Transportation | Peru | http://cyanidecode.org/signatory- company-categories/edewit-sr-ltda- peru |
| ORICA | April 2015 | Ventanilla box to sparge transfer facility Warehouse | Peru | http://cyanidecode.org/signatory- company/orica-australia |



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| CRUZ DEL SUR | February | Transportation | Argentina | https://www.cyanidecode.org/signatory-company/v%C3%ADctor-masson- |
|--------------|----------|----------------|-----------|---|
| | | | | transportes-cruz-del-sur-sa |

During the audit process, the transportation companies were visited to verify compliance with the standards of the "Code"

For the third companies contracting ORICA establishes the following guidelines:

- The service must be complied with under the International Code for the Management of Sodium Cyanide and ICMI Protocol for the Transport of Sodium Cyanide.
- Comply with ORICA's reasonable directions and directions, as well as standard client procedures.
- All standards and procedures of ORICA.
- National laws

In addition, they must be audited by ORICA under its WCCP program, which includes the following evaluation chapters:

- Security Management System
- Contracts
- · Risk Management and Security Base
- Compliance with regulations and regulations
- Transport vehicle
- Equipment
- Maintenance
- Storage
- · Offices and Ports
- Emergency Management
- Physical Security (Facilities and equipment)
- Training and Competition
- Accident Investigation Distribution
- Polvorines
- Management of Containers.

1.3 TRANSPORT PRACTICE 1.3

ENSURE THAT TRANSPORT EQUIPMENT IS SUITABLE FOR THE CYANIDE SHIPMENT.

| | X in full compliance with |
|------------------|--|
| The operation is | ☐ in substantial compliance withTransport Practice 1.3 |
| | □ not in compliance with |

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.3 requiring an operation Ensure that transport equipment is suitable for cyanide shipment.



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Peru Supply Chain

ORICA establishes requirements for maintenance of the units carrying cyanide in the SUPCH-PTR-001 Dispatch and transport of Products v9, 2.11.2016, Which Comply with the Provisions of the law of Peru.

Trailer:

- Category / Class: N3 / Trailer.
- Bodywork: Trailer.
- Fuel: Oil.
- Age: not more than 5 years.
- Shafts, as seen in the DS 058-2003-MTC, Standard Vehicle Weights and Measures (legal International Standard) for cyanide transport units are designated configuration, T3S3, T3S2.

Semitrailer:

04 fastening systems (twistlock, plus pins), which may be fixed.

Excessive load

 ORICA provides that the charge should not exceed the carrying capacity, and this control is performed by using the format "SUPCH-RTR-002 Check List Convoy Escort Truck, SUPCH-RTR-004 Check List Cyanide Unit".

The maintenance of the units is done by the supplier, the parts are original and technicians are specialized for the type of vehicle.

Argentina Supply Chain

ORICA establishes requirements for maintenance of the units carrying cyanide in the PR-SC-004 Dispatch and Transportation of Products.

Trailer:

- Category / Class: N3 / Trailer.
- Bodywork: Trailer.
- Fuel: Oil.
- Age: not more than 5 years.
- Cyanide transport units are designated configuration, T3S3, T3S2.

Semitrailer:

04 fastening systems (twistlock, plus pins), which may be fixed.

Excessive load

 ORICA provides that the charge should not exceed the carrying capacity, and this control is performed by using the format Check List Convoy Escort Truck, Check List Cyanide Unit".

The maintenance of the units is done by the supplier, the parts are original and technicians are specialized for the type of vehicle.

Peru Supply Chain



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According to through the "SUPCH-PTR-001 Dispatch and transport of Products v9, 2.11.2016", ORICA supervisor together with a driver of the transportation company have to check the trucks and trailers completing a checklist per vehicle prior to the departure of the convoy. The checklist requires reviewing:

- Origin and destination of the load
- Names of the driver and supervisor
- Shipment documentation (insurance, current technical inspection, circulation permit, among others)
- Driver's documentation (license and ID card, and appropriate training certificates)
- PPE (safety hat, goggles, safety boots, vest, gloves, harness, and thermal wear)
- Vehicle safety equipment (cell phone and radio, safety belts, first aid kit, reflective triangles, cones, flash light, horn, fire extinguishers, Jack, snow chains, mirrors, alarms, Wheel wrench, wedges, windshield, among others)
- Lights (blinking, turns, large, stops, among others)
- Placards
- Tires (trucks and spare tires)
- Load verification (braces and twists lock of the semitrailer. Reportedly, this is verified again after loading the container, although it is not registered

During the audit, three (03) bundles of travel records who met the provisions of the "SUPCH-PTR-001 Dispatch and transport of Products v9, 2.11.2016", is evidenced.

Argentina Supply Chain

According to through the "PR-SC-004 Dispatch and Transportation of Products", ORICA supervisor together with a driver of the transportation company have to check the trucks and trailers completing a checklist per vehicle prior to the departure of the convoy. The checklist requires reviewing:

- Origin and destination of the load
- Names of the driver and supervisor
- Shipment documentation (insurance, current technical inspection, circulation permit, among others)
- Driver's documentation (license and ID card, and appropriate training certificates)
- PPE (safety hat, goggles, safety boots, vest, gloves, harness, and thermal wear)
- Vehicle safety equipment (cell phone and radio, safety belts, first aid kit, reflective triangles, cones, flash light, horn, fire extinguishers, Jack, snow chains, mirrors, alarms, Wheel wrench, wedges, windshield, among others)
- Lights (blinking, turns, large, stops, among others)
- Placards
- Tires (trucks and spare tires)
- Load verification (braces and twists lock of the semitrailer. Reportedly, this is verified again after loading the container, although it is not registered

During the audit, three (03) bundles of travel records who met the provisions of the "PR-SC-004 Dispatch and Transportation of Products", is evidenced.

Peru Supply Chain

According to the SUPCH-PTR-001 Dispatch and transport of Products v9, 2.11.2016, ORICA has procedures in place to prevent overloading of the transport vehicles, one CONTAINER of cyanide can be loaded on the vehicle. As seen in the "DS 058-2003-MTC, Standard Weights and Measures Vehicular" (Law of Peru).



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Argentina Supply Chain

According to the PR-SC-004 Dispatch and Transportation of Products, ORICA has procedures in place to prevent overloading of the transport vehicles, one CONTAINER of cyanide can be loaded on the vehicle.

ORICA subcontract the cyanide transport operations.

| Transportation or Warehouse Company | Date of Certification | Operation | State | Link |
|---|--------------------------|---|-----------|--|
| APM TERMINALS | March 2015 | Transportation | Peru | http://cyanidecode.org/signatory- company-categories/apm-terminals- inland-services-sa-peru |
| TRANSALTISA | July 2016 | Transportation | Peru | http://cyanidecode.org/signatory- company/transaltisa-s-a |
| DCR | June 2017 | Transportation | Peru | http://cyanidecode.org/signatory- company/dcr-mineria-y-construccion |
| EDEWIT | July 2017 | Transportation | Peru | http://cyanidecode.org/signatory- company-categories/edewit-sr-ltda- peru |
| ORICA | April 2015 | Ventanilla box to sparge transfer facility Warehouse | Peru | http://cyanidecode.org/signatory- company/orica-australia |
| CRUZ DEL SUR | February | Transportation | Argentina | https://www.cyanidecode.org/signatory- company/v%C3%ADctor-masson- transportes-cruz-del-sur-sa |

During the audit process, the transportation companies were visited to verify compliance with the standards of the "Code"

For the third companies contracting ORICA establishes the following guidelines:

- The service must be complied with under the International Code for the Management of Sodium Cyanide and ICMI Protocol for the Transport of Sodium Cyanide.
- Comply with ORICA's reasonable directions and directions, as well as standard client procedures.
- All standards and procedures of ORICA.
- National laws

In addition, they must be audited by ORICA under its WCCP program, which includes the following evaluation chapters:

- Security Management System
- Contracts
- Risk Management and Security Base
- Compliance with regulations and regulations
- Transport vehicle
- Equipment
- Maintenance
- Storage
- Offices and Ports
- Emergency Management



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- Physical Security (Facilities and equipment)
- Training and Competition
- Accident Investigation Distribution
- Polvorines
- Management of Containers.

1.4 TRANSPORT PRACTICE 1.4

DEVELOP AND IMPLEMENT A SAFETY PROGRAM FOR TRANSPORT OF CYANIDE.

| | X in full compliance with |
|------------------|--|
| The operation is | ☐ in substantial compliance withTransport Practice 1.4 |
| | □ not in compliance with |

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.4 requiring an operation Develop and implement a safety program for transport of cyanide.

ORICA established a transportation method avoiding disturbances during motion.

For the transport of sodium cyanide, ORICA verify that the transportation company count with a control room, with the GPS system continuously provide the positioning of each of the vehicles at all times. Also, ORICA follows the units by means of the system installed by the transport companies.

The transportation companies have a control room at:

| Transportation or Warehouse Company | Ubication | Operation | State | Link |
|---|---|----------------|-----------|--|
| APM TERMINALS | Callao | Transportation | Peru | http://cyanidecode.org/signatory- company-categories/apm-terminals- inland-services-sa-peru |
| TRANSALTISA | CallaoArequipa | Transportation | Peru | http://cyanidecode.org/signatory- company/transaltisa-s-a |
| DCR | Arequipa | Transportation | Peru | http://cyanidecode.org/signatory- company/dcr-mineria-y-construccion |
| EDEWIT | • Lima | Transportation | Peru | http://cyanidecode.org/signatory- company-categories/edewit-sr-ltda- peru |
| CRUZ DEL SUR | Mar de Plata | Trasnportation | Argentina | https://www.cyanidecode.org/signatory- company/v%C3%ADctor-masson- transportes-cruz-del-sur-sa |

During the audit process, the above-mentioned transport companies were visited to verify the good functioning of their GPS systems, as well as to verify, the actions to be taken in case of signal loss.



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ORICA requires inspection of plate load information (DOT, UN and NFPA) verification of the truck "Check List Convoy Escort Truck, Check List Cyanide Unit". Signage is provided in order to comply with local regulations, which are based on the UN Recommendations on the Transport of Dangerous Goods. Copies of the placards are included in the Emergency Response Plan.

ORICA indicates the need for conformity of the client, to ensure that the escort vehicles and transport vehicles are in optimal conditions.

ORICA conducts vehicle inspections prior to each departure/shipment. (Check List Convoy Escort Truck, Check List Cyanide Unit)

During the audit process, records of inspections prior to each departure shipment are evidence.

ORICA, during its continuous visits, evaluates the compliance of the maintenance plan of the units of the transporters, during the audit, it was visited and evidenced the registration of the inspection reports of ORICA, also, it was visited to the transportation company and evidenced the Maintenance Plan for each one of them.

Drivers must rest at least 08 hours before a trip and must not drive more than TEN (10) hours per day, drivers drive up to FIVE (05) hours continuously, with breaks every TWO (2) hours. It is noteworthy that Regulations of Peru set the same schedule for the transportation of hazardous. And according to the Procedure for transportation of sodium cyanide, drivers can drive up TEN (10) hours, and stops are designated prior to the departure of the convoy. Facilities where the convoys stop are fenced and have 24 hours security guards.

ORICA states that the load of cyanide must travel in 20-foot, 40-foot CONTAINER or ISOTANKS, developing mechanisms to prevent its movement.

ORICA has anchoring mechanisms for the container and lashing system for cyanide in the container.

The procedure specifies:

- Internal
 - o The load must be uniformly distributed on the floor of the container
 - o Avoid empty spaces
 - o Avoid slips
- External
 - Insured by 04 anchorages
 - o Sometimes with 02 cross-links
- Inspections of Cargo Securing Materials
 - o The condition of the load securing elements is inspected using Check List Cyanide Unit.

The trip will take place in convoy mode; the supervisor of ORICA is responsible for the assessment of climatic conditions and is empowered to suspend the transport convoy.

At the end of the trip, the leader of the operation and drivers must submit a report detailing the same road incidents, anticipated information, sensitive areas, and find relevant information to ensure the safety on future trips.

"Alcohol and Drug Policy" It is prohibited the consumption of alcohol, drugs or any other substance that may impair or reduce the function of the driver or a member of the convoy in which prior to the start of each trip everyone must go through an alcotest and periodical drug tests; the violation of this policy results in the separation of the worker from the operation.



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Periodic controls of toxicological tests were evidenced for the auditor.

The plans and procedures for compliance with the Code are reviewed annually and annual surveillance audits are developed to verify compliance with the ORICA standards.

ORICA keeps the records of the transport activity and inspection of the cargo units, evidenced the reports of the 2016.

ORICA establishes guidelines to ensure that their subcontractors comply with items 1, 2 and 3 of this must be respected according to the Transport Practice 1.4.

1.5 TRANSPORT PRACTICE 1.5:

| FOLLOW INTERNATIONAL | CT V NID V D DC E O D | TD A NICDADT ATIANI (| JE CAVIIDE DA CEV | V VID VID |
|----------------------|-----------------------|-----------------------|-------------------|-----------|
| | | | | |

| | X in full compliance with |
|------------------|--|
| The operation is | ☐ in substantial compliance withTransport Practice 1.5 |
| | □ not in compliance with |

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in NOT APPLICABLE with Standard of Practice 1.5 requiring an operation Follow international standards for transportation of cyanide by sea and air.

ORICA not transported by sea transport and air transport within the territory of Peru and Argentina.

1.6 TRANSPORT PRACTICE 1.6:

TRACK CYANIDE SHIPMENTS TO PREVENT LOSSES DURING TRANSPORT.

| | X in full compliance with |
|------------------|--|
| The operation is | ☐ in substantial compliance withTransport Practice 1.6 |
| | □ not in compliance with |

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.6 requiring an operation Track cyanide shipments to prevent losses during transport.

ORICA states that contract carriers must use a GPS system. They must also have a telephone service, radio and cellular pathway that ensures full coverage during movement to connect with the control center of the transport company and of ORICA. In addition to providing, a system that continuously indicates the position of each vehicle at all times.

ORICA inspects the telephone lines are in operation prior to departure, further checks are done to verify the operation of mobile equipment, GPS and radio by Check List Convoy Escort Truck, Check List Cyanide Unit.



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Additional, ORICA periodically test communication equipment to ensure it functions properly.

The phone lines were operating at the time of the audit; and also an inspection was done to verify the operation of mobile equipment and it was found the payment of the phone, the GPS, satellite phone and the radio UHF services.

ORICA have identified areas without cell coverage and radio, for it asks ORICA contract carriers using satellite equipment.

ORICA requests transportation companies to have a GPS system, the transporters grant the access code and contact telephones so that ORICA staff can verify the progress of the units in real time. During the audit, the monitoring carried out by the ORICA staff was verified.

Before each trip ORICA check the bill of lading and waybill, transported amounts of cyanide, Data Sheet Material Safety also this documentation must be available throughout the trip as ORICA guidelines, this same data is review by Customer (final destination). Note that this information must be show to the inspectors if MTC is request otherwise the carrier be fine.

ORICA, for each trip issue a reference guide indicating the name of the product, the United Nations (UN) number, and the weight of the packages transported quantity of cargo, as well as the safety considerations of the indicated product. A copy of the safety sheet is also issued. These documents are in the ownership of the driver and are available throughout the transfer.

ORICA verifies the availability of documentation through a pre-trip check list.

The records were evidenced during the audit.

ORICA establishes guidelines to ensure that their subcontractors comply with the elements 1 to 6 of this, should be respected according to the Transport Practice 1.6.



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INTERIM STORAGE

Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.

2.1 TRANSPORT PRACTICE 2.1

STORE CYANIDE IN A MANNER THAT MINIMIZES THE POTENTIAL FOR ACCIDENTAL RELEASES.

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 2.1

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in NOT APPLICABLE with Standard of Practice 2.1 requiring an operation Store cyanide in a manner that minimizes the potential for accidental releases.

This Practice is not applicable; ORICA, is certified sparge plant in Ventanilla, Peru certified as distribution warehouse.



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EMERGENCY RESPONSE:

Protect communities and the environment through the development of emergency response strategies and capabilities.

3.1 TRANSPORT PRACTICE 3.1:

PREPARE DETAILED EMERGENCY RESPONSE PLANS FOR POTENTIAL CYANIDE RELEASES.

| | X in full compliance with |
|------------------|---|
| The operation is | ☐ in substantial compliance with Transport Practice 3.1 |
| | □ not in compliance with |

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.1 requiring an operation Prepare detailed emergency response plans for potential cyanide releases.

ORICA has an Emergency Response Plan, the information on road conditions, defined in the Roadmap document. The Emergency Plan describes the response actions for emergencies previews. These were verify during the audit.

The Emergency Response Plans for transportation is suitable for the selected transport route, based on the hazards and risk assessment after the completion of the ROADMAP.

The Emergency Response Plan is suitable for the selected transport route, taking into account the physical and chemical form of cyanide clearly based on the Safety Data Sheet of the Product "Sodium Cyanide". ORICA is a transporter of sodium cyanide supply in solid state (briquettes).

ORICA indicates the use of trucks to transport sodium cyanide taking into account the characteristics of the equipment and assesses the structural condition of the road where the transportation sodium cyanide is done.

Information on road conditions is defined in the Roadmap document. The Emergency Response Plan describes the response actions for anticipated emergency situations. These were verified during the audit.

It also establishes the logical line of action to be taken by the convoy leader and drivers in case irregularities arise during transportation of sodium cyanide.

ORICA requests and verifies that the transport companies use trucks also all ships in trailers low or high platform acquired with a maximum load capacity of 22 tons, which are certify to transport sodium cyanide by the Government Peruvian.

ORICA sets action if incidents occur on the route which is described below.

- Mechanical problems/does not continue
- Rollover with spill
- Rollover with no spill

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- Fire in the truck
- Crash with injuries/no injuries
- Water spill, cleaning and decontamination
- Spill with rain (falling to the ground, Meltdown, the presence of others, railway, earrings)

Awareness on the part of drivers and supervisors of the actions in each case was evidenced after interview with the staff.

ORICA subcontracts External Emergency Responder (IFSEC PERU, in case of Peru) and also contacts the Fire Department, Police, and Emergency Medical Services.

During 2nd Response emergencies, the External Emergency Responder is in charge of the emergency response actions when they arrive (delimitation of the area, communication, and access and traffic control are performed by the drivers and the safety specialist while the External Emergency Responder arrives). However, when the National Fire Department arrives to the scene, they take control of the emergency, as established by local regulations. This is established in the Emergency Response Plan. Finally, specific roles of each outside responder are outlined in the Emergency Response Plan.

3.2 TRANSPORT PRACTICE 3.2:

DESIGNATE APPROPRIATE RESPONSE PERSONNEL AND COMMIT NECESSARY RESOURCES FOR EMERGENCY RESPONSE.

| | X in full compliance with |
|------------------|--|
| The operation is | ☐ in substantial compliance withTransport Practice 3.2 |
| | □ not in compliance with |

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.2 requiring an operation Designate appropriate response personnel and commit necessary resources for emergency response.

ORICA during the audit has show that Drivers, and Supervisors receive training in emergency response from appropriate personnel on the safe handling of cyanide (spill and intoxication) and others receive training courses in defensive driving, firefighting, first aid. These trainings are renewed annually complying with the training plan 2016.

Training given to staff

- Hazardous Material HAZMAT 1 warning level
- Hazardous Material HAZMAT 2 basic operations
- Hazardous Material HAZMAT 3 Technical
- Defensive driving
- Safe handling of cyanide
- Emergency Response Plan



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The training program is developed annually and can be enhanced according to performance and safety indicators and / or customers' requirement. For staff security awareness, it has adopted implementing further safety talks, which are made by the Security area, Supervisors and the same staff.

The Emergency Response Plan, Drivers, Supervisors, Chief safety, Operations Manager, Central Monitoring Coordinator, and General Manager are responsible to respond in an emergency; They have received the necessary training for efficient emergency response.

The Emergency Response Plan each truck has the necessary amount of emergency response equipment and the Supervisor of ORICA also has a Response Kit for spills and poisoning, and personal protective equipment which must be verified before the trip, as well as the verification of courses prior to starting the travels and the periodic emergency response training.

ORICA has the necessary equipment for emergency response in the event of a major spill. Which is verified by the "Check List Convoy Escort Truck, Check List Cyanide Unit".

There were verified the records of the emergency response and inspection of equipment. The presence of such equipment in the convoy was verified. In the Emergency Plan indicates the functions of the staff in case of an emergency, and also the emergency equipment to be used in both the first and the second response. The Emergency Plan describes the specific functions of the emergency response and the staff responsibilities.

In the SUPCH-PTR-001 Dispatch and transport of Products v9, 2.11.2016, is specified the verification criteria of the units before each journey. In case of Peru.

In the PR-SC-004 Dispatch and Transportation of Products, is specified the verification criteria of the units before each journey. In cse of Argentina

During the audit, inspection records were evident.

The Supervisor of ORICA is responsible for ensuring the timely change of those equipment needed for emergency response, and proceeded to inform the Logistics area any requirement on the matter.

ORICA establishes guidelines to ensure that their subcontractors comply with the elements 1 to 6 of this, should be respected according to the Transport Practice 3.2.

3.3 TRANSPORT PRACTICE 3.3:

DEVELOP PROCEDURES FOR INTERNAL AND EXTERNAL EMERGENCY NOTIFICATION AND REPORTING.

| | A in run compnance with |
|------------------|--|
| The operation is | ☐ in substantial compliance withTransport Practice 3.3 |
| | □ not in compliance with |

V in full compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 3.3 requiring an operation Develop procedures for internal and external emergency notification and reporting.



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It was evident that the contact information in case of emergency is update in case of emergencies and update the Emergency Plan in this case warrants. The Emergency Plan indicates the current list of contact, which is review, and updated through calls in each revision of Emergency Planning. By performing 02 calls to the numbers given in the contact list updating is evidenced contact numbers in case of emergency.

The Emergency Response Plan includes an internal communication and external schema that specifies the call flow by the safety personnel, the receptors, the regulatory agencies, external response providers, medical centers, fire departments, and communities potentially affected by an emergency.

3.4 TRANSPORT PRACTICE 3.4:

DEVELOP PROCEDURES FOR REMEDIATION OF RELEASES THAT RECOGNIZE THE ADDITIONAL HAZARDS OF CYANIDE TREATMENT CHEMICALS.

| | X in full compliance with |
|------------------|---|
| The operation is | ☐ in substantial compliance with Transport Practice 3.4 |
| | □ not in compliance with |

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.4 requiring an operation develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

It was noticed in the Emergency Response Plan the description of how to recover or neutralize the solids, the procedure of decontamination of soils or other contaminated medium and how to manage these wastes.

The Emergency Response Plan prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released to surface waters.

3.5 TRANSPORT PRACTICE 3.5:

PERIODICALLY EVALUATE RESPONSE PROCEDURES AND CAPABILITIES AND REVISE THEM AS NEEDED.

| | X in full compliance with |
|------------------|--|
| The operation is | ☐ in substantial compliance withTransport Practice 3.5 |
| | □ not in compliance with |

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.5 requiring an operation Periodically evaluate response procedures and capabilities and revise them as needed.

The ORICA's Management is responsible for requesting immediate changes to this Plan, in the event of serious incidents, by simulation results, results of audits or inspections by process improvement etc.



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During the audit, records spill drill evidenced, in 2016.

The Emergency Response Plan and the Training Plan define the frequency of emergency drills. The document presents the schedule of emergency simulations.

The simulations are made by the Chief of Safety who has an ANNUAL DRILL PROGRAM indicating the completion of ONE (01) practical simulation for operation in Peru and Argentina, for the purpose of evaluating the effectiveness of the Emergency Plan and correct what is indicated on it.

The purpose is to measure the efficiency of the response procedure to ensure that the staff involved in an emergency act according to the Emergency Response Plan.

The Supervisor of ORICA takes into account the rapid preliminary compilation of the situation, gathering basic facts as they are known such as time the who, what, where, when, how and why of the situation, contacts the responsible person and broadcasts the obtained information, and continuously communicates with the Supervisor of ORICA and will meet the requirements of authorities.



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Alcance de certificación:
PROVISIÓN DE SERVICIOS DE CONSULTORÍA.
CAPACITACIÓN Y GESTIÓN DE RECURSOS HUMANOS.
MONITOREO OCUPACIONAL.

ISOSURE S.A.C.

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